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9 Attorney for Plaintiffs

10 UNITED STATES BANKRUPTCY COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO DIVISION

13 In Re:) Case #: 07-29855-B-13J
14 Horace Simpson) Chapter: 13
15 Gwendolyn Simpson)
16)
17)
18)
19)

20 Horace Simpson) Adversary #: 08-02618
21 Gwendolyn Simpson,)
22 Plaintiffs)
23)
24)
25)

26 v.

27 Chase Home Finance, LLC,)
28 US Bank National Association,) Date:
JPMAC 2005 WMC 1 JP Morgan Mortgage) Time:
Acquisition Corp 2005-WC-1) Place: U.S. Bankruptcy Court
JP Morgan Acquisition Corp.) Department B
JP Morgan Acceptance Corporation I) Courtroom 34, 6th Floor
JP Morgan Chase Bank,) 501 I Street
Does 1-10.) Sacramento, CA 95814
29 Defendants.)
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STIPULATED REQUEST FOR ORDER EXTENDING THE DEADLINE FOR
DISCOVERY AND OTHER DEADLINES

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2 Plaintiffs, Horace Simpson and Gwendolyn Simpson, by and through their attorney Mark
3 A. Wolff of Wolff and Wolff, and Defendants, Chase Home Finance, LLC, US Bank National
4 Association, JPMAC 2005 WMC 1, JP Morgan Mortgage Acquisition Corp 2005-WC-1, JP
5 Morgan Acquisition Corp., JP Morgan Acceptance Corporation 1, JP Morgan Chase Bank hereby
6 stipulate and jointly request that the Court extend all deadlines set forth in the scheduling order.
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8 RECITALS

- 9 1. On March 19, 2009 the Court issued a Scheduling Order setting a deadline for
10 completion of discovery on October 1, 2009. The Order also set deadlines to
11 disclose experts and exchange expert reports for October 1, 2009., the last date to
12 hear Motions for Summary Judgement for January 19, 2010, the Pre Trial
13 Conference to take place on February 3, 2010 at 11:00 AM, and the close of
14 expert discovery to be December 1, 2009.
- 15 2. Both parties have conducted some discovery and desire to propound additional
16 discovery based on the parties desire to extend deadline for discovery as well as
17 all other deadlines as set forth below.
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19 STIPULATION

20 BASED UPON THE FORGOING RECITALS IT IS HEREBY STIPULATED THAT:

21 The Parties agree, subject to Court approval, to extend the deadlines as follows:

- 22 a. The close of non-expert discovery will be April 15, 2010;
23 b. The last date to disclose experts will be April 15, 2010;
24 c. The last date to exchange expert reports will be April 15, 2010;
25 d. The Close of Expert Discovery will be June 14, 2010;
26 e. The Last date to hear motions for Summary Judgement will be August 3,
27

2010;

- f. Pretrial Statements will be due August 11, 2010;
- g. The Pretrial Conference will take place on a date to be determined by the Court and set forth in the Order Approving this Stipulation

The Parties agree that all other dates/deadlines set forth in the Scheduling Order shall remain the same.

Dated: 12

WOLFF & WOLFF

By: 

Mark A. Wolff
Attorneys for
Horace and Gwendolyn Simpson

Dated: 12/22/09

ADORNO, YOSS, ALVARADO &
SMITH

By: 

S. Christopher Yoo
Attorneys for
Chase Home Finance, et al.